



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

June 2, 2005

Certified Mail No. 7000 1670 0013 8128 9922

Steve Busby
Plant Operations Manager
Land O'Lakes Purina Feed LLC
1711 South 2300 East
Gooding, ID 83330

RE: Facility ID No. 047-00011, Land O'Lakes Purina Feed LLC, Gooding
Final Permit Letter

Dear Mr. Busby:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-050403 to Land O'Lakes Purina Feed LLC located in Gooding, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho). This permit is effective immediately, and replaces PTC No. P-990073, issued November 8, 1999, the terms and conditions of which shall no longer apply.

This permit does not release Land O'Lakes Purina Feed LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Since this project does not significantly change the terms of your permit, DEQ will not contact you regarding a meeting to discuss the terms of the permit. However, if you wish to meet to discuss the permit terms and requirements, you may contact Steve VanZandt of the Twin Falls Regional Office to schedule a meeting. If a meeting is scheduled, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/AC/sd
Enclosures

Permit No. P-050403



**Air Quality
PERMIT TO CONSTRUCT**
**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-050403

FACILITY ID No.: 047-00011

AQCR: 063

CLASS: B

SIC: 0723

ZONE: 11

UTM COORDINATE (km): 686.9, 4757.2

1. PERMITTEE

Land O'Lakes Purina Feed LLC

2. PROJECT

Permit to Construct Revision - Facility Name Change

3. MAILING ADDRESS

1711 South 2300 East

CITY

Gooding

STATE

Idaho

ZIP

83330

4. FACILITY CONTACT

Tony Haman

TITLE

Production Supervisor

TELEPHONE

(208) 934-5277

5. RESPONSIBLE OFFICIAL

Steve Busby

TITLE

Plant Operations Manager

TELEPHONE

(208) 286-4583

6. EXACT PLANT LOCATION

Section 35, Township 5 South, Range 15 East

COUNTY

Gooding

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Steam flaking of corn and barley, grain storage, and dairy vitamin and mineral supplement blending

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.


**TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: June 2, 2005

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Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
MMBtu/hr	million British thermal units
NSPS	New Source Performance Standards
PTC	permit to construct
SIP	State Implementation Plan
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050403

Permittee:	Land O'Lakes Purina Feed LLC	Facility ID No. 047-00011	Date Issued:	June 2, 2005
Location:	Gooding, Idaho			

1. PERMIT TO CONSTRUCT SCOPE***Purpose***

- 1.1 The purpose for this PTC is to revise the facility's existing PTC. This PTC revision is a facility name change. Emissions do not increase.
- 1.2 This permit revises PTC No. P-990073, issued November 8, 1999, the terms and conditions of which shall no longer apply.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	<u>Natural Gas-Fired Boiler</u>	None
	Rated Heat Input Capacity: 4.3 MMBtu/hr	
	Grain Receiving System	
	Dairy Feed Supplement	

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Facility ID No. 047-00011**Date Issued: June 2, 2005****2. BOILER, GRAIN RECEIVING AND HANDLING, AND DAIRY FEED SUPPLEMENTS****2.1 Process Description**

The facility operates a natural gas-fired boiler with a rated heat input capacity of 4.83 MMBtu/hr. The boiler is used to supply steam to the corn and barley flaking process. The facility also operates a grain receiving system capable of handling 40,000 bushels per hour, and dairy feed supplement system that receives, stores, blends and loads out vitamin/mineral supplements.

2.2 Emissions Control Description

Emissions from the boiler are uncontrolled. No stacks are associated with the grain receiving and dairy feed supplement systems.

Emissions Limits**2.3 Opacity Limit**

Emissions from the boiler stack, or any other stack, vent or functionally equivalent opening associated with this facility shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.4 Visible Emission Limits

Visible emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60 minute period. Visible emissions shall be determined by EPA Reference Method 22, as described in 40 CFR 60, Appendix A, or a DEQ-approved alternative method.

Operating Requirements**2.5 Reasonable Control of Fugitive Dust**

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne as required by IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as proximity of dust-emitting operations to human habitation and/or activities and atmospheric conditions which might affect the movement of particulate matter. Some of the reasonable precautions may include, but are not limited to, the following:

- Application, where practical, of water or environmentally safe chemicals for the control of dust from plant roads;
- Paving of roadways;
- Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials;
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts; or

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- Covering or enclosing, where practical, of stored materials likely to give rise to airborne dusts.

2.6 Open Burning

The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning.

Monitoring and Recordkeeping Requirements

2.7 Fugitive Dust Complaint Monitoring

The permittee shall maintain records of any fugitive dust complaints received. The records shall include, at a minimum, the date that a complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, and any corrective action(s) taken to remedy the cause for the complaint. This information shall be made available to DEQ representatives upon request.

Reporting Requirements

2.8 Certification of Documents

All documents including, but not limited to, records, monitoring data, supporting information, request for confidential treatment, testing reports, and compliance certifications submitted to DEQ shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.